

t\$0 East Bay Street Charleston, South Carolina 29401 United States of America

telephone: 803-937-0110 facelmile: 803-937-4310 let Floor South 19/1) Gray's lan Square London WCift 51D United Kingdom

> telephone: (171) 605-7117

(171) 831-8303

December 29, 1998

Mr. F. Andrew Turley, Esq. Central Enforcement Docket Federal Election Commission 999 E. Street NW Washington, DC 20463

Reference:

MUR 4855:

Response to the Complaint against Burkhold For

Congress et. al.

Dear Mr. Turley,

On November 20, 1998 the Mike Burkhold for Congress Committee ("BFC") received your letter regarding an administrative complaint filed by Mr. Burkhold's Democratic opponent John Spratt. Specifically, the complainant objected because (1) Mr. Spratt could not determine the source of several loans of personal funds in reviewing a personal financial disclosure report, and (2) Mr. Spratt was dissatisfied with BFC's "best efforts" reporting. This letter responds to that complaint.

Mr. Spratt's complaint has no merit and should be dismissed. As an initial matter, Mr. Spratt's complaints about the completeness of Mike Burkhold's personal financial disclosure ("PFD") statement are misplaced. PFDs are required by the Ethics in Government Act of 1978, not the Federal Election Campaign Act. Jurisdiction over enforcement of Ethics in Government Act of 1978 is vested in the House of Representatives Committee on Standards of Official Conduct and the U.S. Department of Justice, not the Federal Election Commission. Mr. Spratt's complaint about alleged violations of 5 U.S.C. app. 102 is therefore misdirected.

Furthermore, Mr. Spratt offers no evidence that Mr. Burkhold's loan of personal funds came from anything other than personal funds. Rather, Mr. Spratt has filed a complaint based upon suspicion and speculation – simply because his campaign cannot itself discern "any possible source for the loans in question." In fact Mr. Burkhold's personal funds came from the sale – a taxable event at fair market value – of a portion of his

Letter to Mr. F. Andrew Turley, Esq. Page 2
December 29, 1998

interest in Zeus Mediterranean Foods, LLC. See Affidavit of Michael Burkhold, attached hereto as Exhibit A and incorporated by reference, par. 4. Federal regulations permit candidates to convert personal illiquid assets into liquid funds for the purposes of contribution to their own campaign. 11 C.F.R § 110.10(b)(1).

It is also worth noting that the Burkhold for Congress Committee never spent any of the personal funds loaned. In each case, the personal loans made just prior to the close of reporting periods were repaid in full, never having left the campaign account. See Exhibit A, par. 5.

As regards the alleged failure to exercise "best efforts", BFC has endeavored to report all required information. BFC solicitations include the recommended language requesting donor's names, addressed, occupations, and employers. See Exhibit A, par. 6. BFC sends follow-up letters where itemized donors fail to provide this information. Moreover, BFC has endeavored to promptly amend its reports that lack this required information. See Amendments on file with the Commission. BFC takes this requirement seriously and is presently unaware of any missing occupation or employer information for which best efforts to obtain the data have not been exercised.

Mr. Spratt's malicious assertions and breathless partisan broadsides do not require Commission investigation or action. The Commission's efforts through its RFAIs adequately assist campaigns such as BFC in ensuring that all required information is produced. Taxpayer resources are better spent on actual violations of the law, and this complaint should be dismissed.

Sincerely,

Timethy D. Scrantom

cc: Mike Burkhold

enclosures

H

EXHIBIT A

STATE OF SOUTH CAROLINA

COUNTY OF YORK

Personally appeared before me this zereday of December, 1998, Michael B. Burkhold, Jr., who first being duly sworn, deposes and says as follows:

- 1. I am a resident of York County, South Carolina.
- During 1998 I made an unsuccessful run for the South Carolina 5th Congressional
 District seat in the United States House of Representatives.
- 3. My opponent in the recent election, John Spratt ("Spratt"), has filed a malicious and baseless administrative complaint with the Federal Election Commission ("FEC"), raising issues concerning the funding of my campaign for Congress.
- 4. Specifically, Spratt has attacked my use of proceeds from the sale of part of my interest in Zeus Mediterranean Foods, LLC ("Zeus"), a food company of which I am a part-owner, in order to finance my campaign. This sale was a taxable event at fair market value, and the proceeds were loaned to the Mike Burkhold for Congress Committee ("BFC").
- None of the proceeds from the sale of my interest in Zeus were ever actually spent by my campaign. Rather, the personal loans to BFC made just prior to the close of reporting periods were repaid in full, having never left the BFC campaign account. See BFC Campaign Filings, attached hereto as Exhibit 1 and incorporated by reference.
- 6. Spratt has also alleged that BFC failed to use "best efforts" in reporting sources of campaign funding. I attest that BFC solicitations include FEC recommended language regarding donors' names, addresses, occupations, and employers. See sample BFC

solicitation attached hereto as <u>Exhibit 2</u> and incorporated by reference. Moreover, BFC sent follow up letters where itemized donors failed to provide requested information, and BFC has promptly amended reports lacking required information.

FURTHER AFFIANT SAYETH NAUGHT.

Michael & Burkhold Tr.

MBBM

Sworn to before me

this 29 day of December, 1998.

Notary Public for South Carolina

My commission expires: s 1-16-2007

EXHIBIT 1

Hedrice C		LCANS		Page 1st 1st 2 Miles Running (Con Company) and the Control of the
mont commune on man Committee to Elect Mike Burkhold to	Coan	~s\$	C00329	3/0
A Fundament Making Address and 21P Code of Louis Senson	~ · · ·	Original Amound	Completion Physics To Celo	Balance Caintending at Classe at This Parket
OMERITARE TO E HOLF MIKE BUT KHOLF TO A PUBLISHED WARD MAKENE AND EDGE OF LOW SOURCE PLANE 1954 MILLE SC 297-32. BUTON: APRICATE LICENSIA : 100mm (spacely):		*30,00°	0	£30,000
Terris: Data bouned 3/3/20 One Out /	2/99	interest Ros C	%(n(x))	.; Goowed
List All Enforces or Georgeolors (II way) to Beam A				
1. Fell Elegio, McGrig Address and ZIP Code	Name	of Employer		
j ·	Ocean	ellan		
	L_		_>/////////////////////////////////////	
	Action	i (2 maritud Outstander):		
2. Fad Names, Making Address and ZIP Code	Pégans	Of Employer		
	Occup	SP On		
	Atalogue	d Gostoniand Outstanding	- (////////////////////////////////////	
	3			
3. Pak Norm, Malling Afteress and ZEP Code	Nhrss	ci E <i>ssployer</i>		
	007/0	Vis.	-~	
		arg.		
	ACTION	N Campalled Order dag:		
B. Fell Name, Idabian Address and ZIP Code of Liter Source	4	Original Assets	Contributes Pagencon	. Balanco Oulsianson
NBYC		ef insp	To Date	A Cose of This Preint
Box 3776 Rock H.II. SC 29732 Extra M. Phoney Lighted Light Rose By H.		46%.00	# 164.9B	\$1,531.02
Torse: Date Sycares 1/72/99 Oct Oct 1	2/1/94	International Parks LECK	si(apo)	E Secret
Llat All Endorsors or General date (III amp) to been 8	<u></u>			
1. PLB (Nemps, Moultag Actions and 20° Code		र्व दिख्योगुङ		
M. V. Ruckland	Tra	on of Clover		
1956 Middleton Place	Optio	500 A		
Rock 4:11, 50 29732	0	on Alministrates		
	5.6	7 (2000) (10 (2000) (10 (2000) (10 (2000) (10 (2000) (10 (200)) (1		
2. PLE Herray, Marting Address and ZiP Code	Pit may	of Geoplespa		
N Company of the Comp	Cons	25	-(1111111111111111111111111111111111111	
·	1	••		
·	1		-	
·	Smiss	Granting Outcoming		W
· ·	6		-\/////////////////////////////////////	
3. Full Name. Westing Activess and 20° Code	Rame	of Estatives		
3. Fill Blamis. Westing Address and 200 Cods	6	of Estatives		
3. Full Blarne. Westing Acideess and 200 Codes	6 Rami	of Estatoyae	- <i>William</i> - <i>William</i>	
	6 Rami	of Estatives		
	6 Rami	of Estatoyae		
3. Fill Name. Wating Address and 20° Code 3. OTALS This Passo I this Page (spikers) (ALS This Period first page in this line only)	6 Rami	of Estatoyae		3,531.02

FROM





SCHEDULE C (Revised 380)	1.0	DANS		Page
Committee to Elect Mike Burkhold to (a. Fell Marks, Missing Andrews and its Packet Surces	Chare	!\$\$	COO324	3/0
A. Feel Maine, Maining Andrews and 2017 Code of Louis Streets Miles Breekhold		95 4.63911	Commission Payment To Since	distant Galaxanding at Close of This Period
A feel Marina, Making Andrews and in Pocar of Lown Science Milke But Khold 1954 Anishherton Place Vock Hill, S.C. 29732 Beachas Liphanny Digeneral Liphan (appoint	:	\$39,000.00	30,000	*0
Larran Com treamed 3/3/53 Come Chea 4/2	799	halossesi Reto_2_3	Sison)	<u>ಟ ಶಿಕಾಭಾರ</u>
List M Sedimond or Guida Sites 41 steps to hom A				
5, Pull Name, Mailing Address and ZIP Code	Manaci	Başlaştı -		
·	Cocussion	<u>.</u>		
	Arricant G	new med Occupanting		
2 Full Mana, Making Address and ZIP Code	Bleray of S	ECCOPO!		
	Decupeso	ri		
	8	mented Optiming		
2. Full Harre, Meling Ashbuss and ZP Code	Name of 6			
	Cormece			
	Americal Gustian Auril Commencedurgs			
R. Fun Reman, Marting Accesses and 200 Cooks of Louis Senson Netword Book of York County	Organi Amoust of Lean		Consider Present To Call	Edinas Ditabriling or Class of This Parted
Box 3/76 Box HIP, S C 29732	40	1696.00	\$490.37	41,205.63
Electron: U Printerly L Control Li Other (eposity): Teams: Onto Insured Li Colle Com. 12	11/98	transact Rate (LOC)a	Uson	D Secured
Liet As Entropes or Constitutes of and to bear 5			VIIIIIIIIIIII	
1, Fall Manny, Maliyar Address and 22P Cores	Nerte of			
Mike Bushhold 1959 Middleten Hoce	Too	of Chier		
Rock Hill SC 29732	Town	Administrator		
2. FLS Wasse, Malling Address and 70P Code	Name of	<u> </u>		
	Chapes	iń.		
	Astronera G	ingstrated Oxistanding:		
), Full Harms, Walling Address and 29 Cods		Ergoyv		
	Occupati			
	Services C	Learning Chicanolog		
SUBTOTALS This Poriod This Page (spilones)		ر بادر در دور در		
TOTALS This Period does page to the ten only)		الدو و و بازد به معامد ۱۰ د دماه دو او چې چې د المدا است په بابېد د	ود المحادث و محادث المحادث عند وقا فقد كان محادث المحادث وحادث المحادث وحادث المحادث وحادث المحادث ا	
Costy desistanting between only to Last 1, Scincials C.	for this pag.	il no Galericie C, comy lact	rerd to appropriate idea of	Support.

(Revise	DULE C		LOANS		Page 2 or 2 for LIFE MEMBER // C. U.S. STEPHEN CO. S.
NEMAC	romanities to Elect Mike Burkhola A Fed Name, Marting Address and Zer Coope of Lean Sounce Alike Burkhola Alike Burkhola				
(0	maite to blect like Buckhole	l to	CONLINES	C00324	310
	A. Fed Name, Malthing Address and 22° Come of Losen Source		Of talend Assessed	Corpolation Port Total	Wallatten Oktobandion
	Mike Burklos		d'a	To Date	Case of the Period
	A Fed Normal, washing Address and zer Come or Lean Sounces All the Burk to be A 996 Middle ten Place Rock Hill, SC 29732		\$30,000	0	*30,000
	Election: Pointry U. Service Carbon paperings			1 .	
	Terran: Dois top seed 5/20/19 Comm Our !!	3.99	interest flats (5	"Mileor)	J Benured
Ì	Link All Endorses or Quantities (9 arts) to bear A	<u> </u>			
	1. Pus Monea, Mentry Address and Zif Code	f-learne	of Europhysis	-	
	The second was a beautiful and the second	1			
		Open	alon	-\/////////////////////////////////////	
Ì		ļ			
		Sancre	d Control Office Con	{////////////////////////////////////	
ĺ		5	<u> </u>	_9/////////////////////////////////////	
i	2. Fed Mayou, Mailing Address and ZIV Code	MARKI	en Emblohen		
į,		Cook			
ļ		Oct.	ales.		
Į		<u> </u>			
		A-504	ni duara ilaa dagaang:		
Ī	3. Fall Marca, Making Artifless and 257 Code	iteamo	of Employer		
	-	j			
		Ocores	266R		
ŀ				-977777777	
]		Ameu 3	ni Georgeand Deleteratings		
	8. Path Name, lighting heigh our and ZPP Coults of Lates Sources		Congressed Agreements of Assum	Castalistics Proposed To faces	Hannes Ordersanding at Clote of This Period
	Elocher: C Prisoney 1. Camerzi Li Caner (specify):				_
Ì	Terms: Date Incurred Date Due		IDIBRAD RAID	Sept.	. Secured
f	Lim & Erections or Commission (if early to figure 6	,		V/////////////////////////////////////	
	1. Full Names, Making Address and ZBP Cade	Marrie	of Employee	-{/////////////////////////////////////	
•	ा. १८७ ल्डाका, रुक्काम् अध्यक्ष स्थाप २५ ५४००				
Ì		Occord	1	-	
		1			
ļ		Ares	s Constitues Curcumbay		<i>(1111)</i>
]		B		-	
	2, Fr.III blacos, Shalling Addisest and 229 Clock	(6000	of Employee		
- 1		Open	and the same of th	-4/////////////////////////////////////	
1		Across	nt Gunnated Contacting	- ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	
		8		_44444444	
- 1	3, FLB Marine, Malking Address and ZIP Crisis	Pasara	el Engloyer		
į		Occur	neton	-{/////////////////////////////////////	
		Nest	ni Custordend Culturating:	-4/////////////////////////////////////	
SUBTO	TALS This Period This Pegs (optionity)		were and a manifest can restrict the fill the base here had a	ad +0 M pp \$0 M 40 grilly prints year agree agree as a surprise	1
TOTAL	S This Ported (last page in this line only)	36 -0 0000 000 0 000	and the first state of the first		31.205.63
	Cerry cutstanding halower only to LENE & Schooler C.	One place m	na Alexa Orthodolo Di come ha	ment in recognition flat of	
L					
PERMIT					

ad 380)		DANS		Page 2 of 2 or the collection of 2 or the col
ommittee to Elect Mike Burkhold	+-	Con arese	CO324	310
. A Rel Home, Mading Relinant and ZP Code of Laire Strains Alke Cour E-haid		Cities Accord	Gatasistian Paysteri Re Data	
1958 middledon fil Rock Hito, 56 29732 Button, Uptong Ciberard Upton topolitic		30,000	30,000	0
Tapen: Calminoured 5-30-93 Date Dec 1	-2-95	tederual Parter 2	36p)	Jacque
Litt Al Catagory or Committee (Forey) is Mari &	-			
1. Full Name, Maning Address and 22º Chala	dines	d Başloyer		
	653			
•	1000	Greated Collector		
2. Fell Norse, Mailing Address and 207 Claim	Sec. 19	d Employer		
	Cons			
		Comment Comments:		
3. Fed Name, Making Address and ZP Code) Eerghoyen		
	Crass	iter Landschaf Outstanding		
	# 3	i amendada Adama alik		
B. Fall Revo., McSary Address and ZP Code of Long Season		Drighed Actions of Lown	Constitution Payment To Date	Delices Orienting of Class of This Peaks
Plaction: Liferency (J. Ganders (Sportly))		lichaed Rada	Story	Offerend
Total - Des Brand - Des Bra		king Reta	%car)	∏ Becoved
Tennet Data Marcal Dags Date Date Date Date Date Date Date Date			Securi	□ Beound
Tomate Data Internal Date Dua		Employer	Stear	□ Browne
Tennet Data Marcal Dags Date Date Date Date Date Date Date Date	Cons	desployer .	Securit	□ Beoured
Tomate Data Internal Date Date Date Date Date Date Date Date	Consp Acres 8	d Employer	Separit Control of the Control of th	□ fleaund
Tomat: Data Section 2 Commission 2 Comp to Commission 2 Comp to Commission 2 Comp to Commission 2 Commission	Consp.	d Employer Construction Chapternity	Mount	□ fecured
Tomate Data Internal Date Date Date Date Date Date Date Date	Cons S Shana	d Employer Security of Chapter Market of Chapter 1	Securit Control of the Control of th	□ Secured
Toward Desir Referred Described Desc	Cons.	Commission Chainsoning Commission Chainsoning Prochaged Start	Separit	□ Brownel
Tomate Data Internal Date Date Date Date Date Date Date Date	Cons.	dism Considered Challenger of Excellenger of Challenger o	S(ray)	□ Beoured
Toward Desir Referred Described Desc	Gong Stans Gurss Annas B Floras	dism Considered Challenger of Excellenger of Challenger o	Separ)	□ Browney
Toward Desir Referred Described Desc	Cong. Shows Shows Shows Cong. Arrests Arre	Employer Seminary Chapter (1997)	Stoor?	□ Brownd





SCHEDULE C (Revised 9/80) 2MAO I

of Committee (A) Failly			
omaithe to Elect Mike Burthold	to Conviess	CO324.	3/0
A Pal Page, Maling Address and RP Code of Loss Grands	Original America	Domatellas Paymer®	Balance Octobrida
inter profession	് എം. കേ	For Blades -	at Dune of This Post
19 98 mt of Maken P1- Esche 1119, 52 9732 Bection Uperson Bosses Upper trouble		· .	
for 1817 54 2 9732	33,000	0	33,000
Pactors Updated If Greece Update (specific)			
Tames Onto tocorred 6-36-78 Ento Date 1	-2-99 Marine Paris (7)	%(m-1	ij Georged
		VIIIIIIIIIIIIIIII	
List All Endounce or Chargetins (6 supplies than A		_\$/////////////////////////////////////	
1.FAB Name, Matthy Address and 209 Code	turn d'Espoje		
1.	l	_9/////////////////////////////////////	
·	Congressor		
	1		
1	Personal Commerciant Outstanding:		
2. Fell Planto, Holling Address and ZP SOUR	Mano d'Employer		
	Concepto		
1			
1	Avaignt Generated Outsteading		
	Rismo of Deployer	-\(\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	
S. Full Name, Stating Address and ZV Gros			
{		\(\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	
1	Contests	<i>\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\</i>	
	Account Shoot street Constanting	{///////////////////////////////////	
	\$ SERVICE CONTRACTOR		
B. Foll Marso, Walking Address and ZIP Code of Loss Source	Colored Jeanet	Demokrate Protecti	Estate Citation 2
Br Life married manufactured and a section of the section of			
	alton	Yo Date	at Ches of Take Park
	al Laun	Yo Date	at Chara of Tale Pari
	altown	Yo Date	es como es Talo Pari
	al Loto	Ya Bate	en Counce of Thile Pari
Section: L. Primary L. Cambre L. Other populary:	cal Loops	Yo Rate	at Counce of Take Puri
Teams - Own leadered Date 2006			
Testra: Comm Incolored Date (Con-	(riberent Rude		
Teams - Own leadered Date (CO)			
Testra: Comm Incolored Date (Con-	frinces frais.		
Testra: Comm Incolored Date (Con-	(riberent Rude		
Testra: Comm Incolored Date (Con-	from set frais. Frame of Employer Documentary		
Testra: Comm Incolored Date (Con-	frinces frais.		
Testra: Commiscating	Interest Rule. Figure of Employer Decrepation Account Quaranteed Dubstanding:		
Testra: Comm Incolored Date (Con-	(riberes) Rule. Figure of Employer Decreption Account Quaranteed Diletter-lag:		
Testra: Commiscating	(riberes) Rule. Figure of Employer Decreption Account Quaranteed Diletter-lag:		
Testra: Commiscating	(riterest finds. Figure of Employer Description Account Commissed Dubstanding: 8 Name of Employer		
Testra: Commiscating	Interest Stude. Filance of Employer Decrepation Account Quaranteed Dubstanding: Name of Employer Constablish		
Testra: Commiscating	(riterest finds. Figure of Employer Description Account Commissed Dubstanding: 8 Name of Employer		
Testes: Combinated Date Dog. 120 All Parlices or Controllers (Testy) to lists (B 1. FUR stores, McCling Ambuse and 259 Code 9. Full Horse, Malling Address and 259 Code	Interest Fraise. Frame of Employer Decreption Account Quaranteed Outstanding: Name of Employer Committee Amount Businessas Outstanding:		
Testra: Commiscating	France of Employer Decopolion Account Commissed Dubstanding: Name of Employer Commissed Amount Businessed Outstanding: Name of Employer		
Testes: Combinated Date Dog. 120 All Parlices or Controllers (Testy) to lists (B 1. FUR stores, McCling Ambuse and 259 Code 9. Full Horse, Malling Address and 259 Code	Interest Protect Frame of Employer Decreption Account Quaranteed Outstanding: Name of Employer Constraint Accounting		
Testes: Combinated Date Dog. Lize All Professor or Gognetical (I say) to list p 1. Full store, McCing Anthres and ZSP Code If Full Home, Marting Address prof ZSP Code 2. Full Home, Marting Address prof ZSP Code 3. Full Home, Marting Address prof ZSP Code	Interest Frate. Flame of Employer December Account Commissed Dubstanding: Name of Employer Commissed Amount Businessed Outstanding: Name of Employer Commissed		
Testes: Combinated Date Dog. Lize All Professor or Gognetical (I say) to list p 1. Full store, McCing Anthres and ZSP Code If Full Home, Marting Address prof ZSP Code 2. Full Home, Marting Address prof ZSP Code 3. Full Home, Marting Address prof ZSP Code	(riter and Product Frames of Employer Decreption Account Quaranteed Dubeterding: Name of Employer Constraints Amount Beameread Dubeterding: 8 Name of Employer Constraints Amount Consequenced Dubeterding:		
Testes: Combinated Date Dog. Lize All Parliagues or Controlling Arthress and ZSP Code 1. First Herma, Marting Arthress and ZSP Code 2. First Herma, Marting Address and ZSP Code 3. First Herma, Marting Address and ZSP Code 3. First Herma, Marting Address and ZSP Code	Interest Prate. Frame of Employer December Account Courselved Cultister dag: Manual September Cultister dag: Account Better hand Cultister dag: North of Employer Compation Amount Chapter and Cultister dag: 5		
Testes: Com iscoured. Date Doc. 120 All Professor of Controlling of say) to list B 5. First House, Marking Anthrops and 25° Code 2. First House, Marking Address and 25° Code 3. First Nords, Marking Address and 25° Code	(riter and Product Frames of Employer Decreption Account Quaranteed Dubeterding: Name of Employer Constraints Amount Beameread Dubeterding: 8 Name of Employer Constraints Amount Consequenced Dubeterding:		() Garaged
Testes: Commiscatered. Date Disc. Lizz AS Professor or Gogennium of say) to list B 5. Fig. stores, Mriting Anthress and ZSP Code S. Fig. Horse, Maring Address prof ZSP Code 3. Fig. Norse, Maring Ad	Interest Protect Figure of Employer December Account Commissed Outstanding: Amount Bearanness Outstanding: Name of Employer Constitution Amount Commissed Constanding: 5	tuet	33,00

FROM

SCHEDULE C (Revised 3/80)	LOANS		Page To to to Live Market State (Mark Market State (Market State (Market State) Market State (Market State)
Committee to Flet Mile But A. Fall Players. Mailing Approve and 200 Code of Lean Bource	khold to la	noseg	
A Fell Plans Mailing Approximate 200 Case of Lean Bourse Mile Bur Whold 1506 Hadd Lettern Place	d Low	70 Caris	the Second Common of the Particle
Force (fill, 5C 2973) Backers: L'Odmory Morning Li College (aposity):	P 33,00	00 \$33,000	0
terne: Des mares 5/8/ 98 0-00 6	N 193 steron Res	a O securi	/ Second
Line she excurrency on Generalistics of early in 1845 A			
1. Fall Names, Mailing Bottless and SF Codo	Peares of Ecoployee	- //////////	
		////////////////////////////////////	
	Consider		
	Amount County road Charges		
2. For Harran Making Address and ZIP Gods	Marine of Graphorer		
	Occupation .		
	Annal Cutarent Orto		
2 Full Harry, Malling Address and 2IP Code	म्हळक वर्ग सिक्सारपुरम		
	Conveile		
	Correlation.		
	Amusi Glaverine Color		
	<u> </u>		
E. Pad Histric, Michay Address and ZIP Code of Loan Search	Original force	Computation Payments To Date	Salamen Culturating on Classes of This Period
Electure Li Principy L'Ognosti L'Ottor (openint):			
Terra: Date Inquered Date Date	Baserant Pier	12\$LOON	
LINE AND Employments on Charments and Colored to Server B			
1, Pub harns, Rassing Addicate and ZIP Code	Name of Engloyer		
	Оссырация		
	Interest Contract Contract		
	- 8		
2. G.S. Newva, Making Actions and 23P Code	Hares of Employer		
	Geograph		
1			
)	Afront Grantend Culate	mateg: ////////////////////////////////////	
2. Felt Name, Meding Accress and 217 Cods	Nicona of Employer		
T. I are Later and memorial matter article was a Parison			
	Оссырняющ		
}	Ameuri Guttarépe Conta		
	3		533344111111111111111111111111111111111
SUSTOTALS This Posted Ties Page (optioned)	remember & 1881 and a color of the legal of the Laboratory o	الله الله الله الله المستحدد عن المستحدد و الله الله الله الله الله الله الله ال	
TOTALS This Period (East page in INS time only)		ماه ۱۹۰۵ د مستنیست مدم مدم مدم مدم بدراه ماهنان با یا ۱۹۰۵ د پیشون میرسد. در ۱۹۱۱ مستنیست مدم مدم مدم مدم مدم استان با با دراه ماهنان با با ۱۹۰۹ د پیشون میرسد.	
			A Reposition
Corry opietanding balance only to LINE 1, Schoole !	, for this seed if an acceptable of	of Edward and School of Street	
- Company comp			

٥ .				
Made	THE B MEMBER DISB	Principal Removable	Uso regress achidality to early assigner of the Consider Editionary Prope	PAGE OF FOR LINE NUMBER
I Row in	immaken copied from such Reports and Endements nary re res, other Pass using the marks and address of any positive!		stricture of profession district	and a state contract
	concentration for Mile Brookhold	to Congress	C003	3283/0
	annithe to Elet Mile Burkholl	Purpose of Districture	Care (menth,	Amount of Facto
	Aldrianal Bank of York County Box 3/66	represent of loss of	4-98	464.48
ľ	R-1411 S 29732	Cities (specify)	Jepan 5-1-98	166.48
t	Rock II II St 29732	Perpend of District rates	Cay, 1999-)	America de Boco Distribución Trial Partico
	Mike Barkhold 1958 Medde for Phroe	Considered for Person	Games 4 Logs	\$3000
}	Rock (Mil) Sc 297-332- C. Path Marco, Malifry Address and 39 Cada	Purpose of Districture of	geld. Now.) green (Learner	Amount of Each Chicagograph This Portes
		District security (Friends)	Control	
Ì	D. Post Sterne, Mading Address and 33° Code	Purpose of Ortumens of	Opie (march, dep. justi)	Amount of Each Colombianies The Pariod
į		Outstreamph for Friency County	General	
	E. Reff Regres (telling hiddens and ZP Code	Persons of Disbursecents	Calo mora day, 1920	Antigorit el Gacia Circharasmeza Thila Pariod
		Osterstant in: Almay] Baresi	
	F. Fed Name, Hally Address and IP Code	Proposes of Otobusynesses.	Carlo (papralis. days. grant)	Alexant of Carls (Polarismont This Parks)
		Obbureauers Mr. Prissery Const (specify)	Control	
	G. Pali blems, the large delicement IP Colle	Pusone of Claimsontal	day, year)	Arment of Exch Chargement This Parket
		Distantant and for Private Company	Gaerst	
	P., Pad Horre, Shilling Address Stid SP Cities	Perpose of Disbusemant.	Case (merits, day, year)	Removal of Each Chilomorphy I Mr. Poriod
		Other (Moork)		
	i, for Manna, Besting Addrice that BP Code	Pungasu of Citabens Past	027, 1952)	Appeared of Earth Communicated Vota Paried
		Cinbuspouri lat: Primary L Coner (Specify)]Care	
31/9	FOTAL of Claburaconomic This Page (content)	ting giftigg for the bosons belong smaller (E) gap you for the smaller bosons and or a supple sign rays or west finds	And the state of t	
TOT	Di. This Period (less page this like number only)		Lo (1) 12 14 14 14 14 14 14 14 14 14 14 14 14 14	4331.46
FERMH				
		·	·	

P. 3

		4
		(
		4

•		•		uniu sidentale)	PARE, OF,
SEMERULE B .	Mehized diseases	loga :	la cest Central	catagory of the Business Page	FORLASMAZER
Med 16 month	and by the Load self of the Coal of the Co	8000 00 8000			2006.023
Am information could be to the property of the first terms of the firs	م دست ودر زدریده در مدا ادریماز جمدی زدی و داست سی ویمیشهو زبیاهٔ ها وه د	ald or each by any poman tao to have to maind our labellates trave	drey echagg 9 bribers et	en in	
VALUE OF COLORATES OF		and the second s		4	
2 Consillar	= Ele+ Aile Barkloll	ta Ceannas		00334	80
7 0 4144 - 64 773 - 6	7 h	Pages of Distriction		Cod Cered	Awam e Cech
MIZZONE	Rosel Utakon fi	s-sogand of to		diy, glich	Missessered Wiz Period
Rock May	t language.	Champailes Plan	your !	5-22-8	30,800
D. Falking Color A				Den gerale	Exercic Feeb
U.Fairme, Color d		B-Marit Eldkingerabani		Cor. Fami	Catherina of Tab Perical
		George Ping	المحصا	- 9	
	•				
C. PAR Free, Early A		Residences.	'	67, 1984) 64, 1984)	Account of East Consecuted The Period
	to the second of the total			l R	
			Georgia		
D. FRANCE CHARGE	Mileral and Ter Carb	Parms of Delemental		Corp Junella. Coy, 1922)	Accessed of Earls (Echanomerical Tabs Posted
	•		g g	· Control	Puriting and and Amon
		Deboused for Frency	(Caresa)	; ;	
i e par il de la coltra d	All and the training	Chu (duch)		Deso(State)	Acres of Each
	STATES TO STATES OF STATES		1	cej.sest	This Petral
		Minuscreater Person	0.000		
		Totally			
P. FARDERS, Belling S	فع کام سوی	Payou d Chiastania	1	into (except · day, 4029)	Assert to Esca Histographical Track Police
		Constanting Plans	Cocca		
0.001200,0000	1-4	PremodEntrema		Cartera.	Areand Ead Discovered Tab Febri
					Contraction (1940 & Cated)
		Extraoremental Pacery	ರಾಶಾಭ	1	
n. Fel Residence	And an early of Studen			Celo(mata,	Lacini d Esch
1. 10 page 2 carried 3	كالمتحافظ والمتحا المتحار والمتحادة والمتحافظ			CTY, 9250	فلأعا وثبال المستعددة
	•	Chieratia: Fran	10000		
		Coortenally			Anoma (# E5/2)
BASILLE, Milley S	ent es esa	Spiness of Elephanisty		(127. ş ed)	Becomment Telo Period
		Cleaning for Penary	Contai		
		Gontardi Land			
ELITOTEL of Chiberra	edsTibb Pego (options)	الوق ويود (10 و 15 و		46.	30,000
1.					1 mans
TOTAL This Period (last or	ego this line ramber restyl		and the second second		13400
FERENCE					•

H	C	מ	1	ı	E	8

FROM

Uza poperete schodule(s)	PAGE !	OF /
for each category of the		
Dolalled Summary Page	FOR UNE	NUMBER

CHED	ULE 8	II EWIEED DISBOURE	Dotailed Enumary Page	FOR UNE NUMBER	
Any into	ormation excise from such	Reports and Statements may not be an me and address of any political commit	old or used by any person for th	e purpose of soliciting contribution.	flore or for commercial
	E OF COMMITTEE (In Fusi	s elect Mike, Burkh	old to Congress	· ·	
	Mike Bulk 1508 Model 1508 Hold	hold hold ktorthee	Purpose of Deburseners Official postument of to control of Dispurement to: XI Premay	Floor Dato (month, day, year) 7 1 9 8	Amount of Each Disbussement This Period \$33,000
	S. Full Nears, Mailing Addre		Purpose of Dispursement Dispursement for: Primary	Date (month, day, year)	Amount of Each Disbursament This Period
j j	C. Full Name, Mailing Addre	se and ZIP Code	Oper (specify) Purpose of Deburgement	Oats (month, day, year)	Amount of Each Disburgoment This Period
	D. Full Home, Mailing Address	nes and ZIP Cods	Obbursement for: Primery Other (specify) Purpose of Disbursement	Date (month, day, year)	Ansurt of Each Disbursence This Period
	E. Full Marne, Stelling Adom	tes and ZIP Code	Other (specify) Purpose of Disbursement	Dole (more, day, year)	Amount of Each Disburdement This Period
	F. Full Name, Stating Addr	an and ZIP Code	Disbussement for: Primary Other (specify) Purpose of Disbussement	Data (momit.	Amount of Each Disbursement This Period
	P. Pill Rem, rating		Discursament for: Primary	Gay, year)	
	G. Fus Harro, Making Add	Res and ZIP Code	Purpose of Disburgement Disbursement for: Primary	Date (month, day, year)	Amount of Each Disburgerient This Period
	H. Fusi Namo, Malling Add	Tress and 30P Code	Purpose of Debursoment Disbursement for Primer	Date (more), day, year)	Amount of Each Disburgement This Period
	1, Full Pizzer, Meiling &cc	iress and ZIP Code	Purpose of Disbursement Disbursement for: Prime	Oate (month, day, year)	Amount of Each Disbutesment This Portor
·		sYhis Page (optional)	Other (specify)		
-					₩33,000
1 7	DTAL This Period (last pag	e this line number only)			

EXHIBIT 2

Burkhold for Congress P.O. Box 10488 Rock Hill, SC 29731

December 5, 1998

Mr. Matt Kennedy P.O. Box 922 Aiken, SC 29802

Dear Mr. Kennedy:

Thank you for your contribution to our campaign. Federal law requires political committees to report the name, mailing address, occupation and the name of employer for each individual whose contributions aggregate in excess of \$200 in a calendar year.

Would you please provide this information on the bottom portion of this letter in the spaces provided, and return it to me at your earliest convenience.

Sincerely,

(Signature)

Hulic Katterre Treasurer	•
Employer Name: Occupation:	

The state of the s